

CLERK'S OFFICE U.S. DISTRICT COURT
AT LYNCHBURG, VA
FILED

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UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF VIRGINIA CIVIL LYNCHBURG DIVISION

CARRIE N. THOMAS, A/K/A JOYCELYN R.

Case No.: 6:23CV00034

Plaintiff,

vs.

CARLOS DEL TORO, SECRETARY
DEPARTMENT OF THE NAVY, AGENCY

Defendant

REQUEST FOR EXTENSION OF TIME

The Defendant has filed a Motion to Dismiss and, Motion for Summary Judgement on 12/18/2023. I have been notified the Court will only me 21 days from the date of this notice to provide relevant evidence contradicting, explaining, or avoiding Defendant's evidence.

I am respectfully requesting the court extend this period by an addition 60 days for the following reasons:

1. Due to the Holidays, during this time of the year, the mail arrived almost 1 week after this was filed. Leaving me only 14 days to submit a reply. In addition, it has been difficult to conduct any business with attorneys or government agencies with many people on vacation.

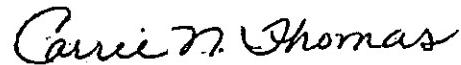
2. I am currently a disabled veteran who is working with the Department of Veteran's Affairs, seeing 3 different psychologists and 1 psychiatrist to assist with my current mental deficiencies. The Defendant has submitted a packet

1 (full of legal jargon) to me, containing roughly 100 pages, which will take me
2 some time to read and understand due to this disability. Also, I am at a
3 disadvantage as I do not have a team of trained attorneys. This is a request for
4 a Reasonable Accommodation in accordance with *Title I of the Americans*
5 *with Disabilities Act (ADA)*. [Documentation can be provided]

- 6
- 7 a. Note: For the past 4 years, and presently, I am being treated for Post
8 Traumatic Stress Disorder (PTSD) as well as Major Depressive
9 Disorder (MDD). There have been discussions of possible full-time
10 admittance into a psychological treatment center. Should this happen,
11 I will inform the Court immediately, and may need a further extension.
- 12 3. Per the decline in my health, I am no longer able to continue with this process
13 as a pro se. I am in the process of finding an attorney to assist me. I waited
14 until this stage of the process to acquire an attorney as I was unsure if the
15 Defendant was going to request a change of venue, meaning if I hired an
16 attorney in Virginia, but they were successful in getting the venue moved to
17 Washington, D.C. it would have been a waste of time and money. Now that I
18 know the venue will remain in the Western District Court of Virginia, I feel
19 more confident about hiring a local attorney.

20
21 Thank you for considering my request.

22
23 Dated the 27th day of December, 2023.
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26 
27

28 Pro Se